



JAPAN P&I NEWS

To the Members

Australia—Using Exhaust Gas Cleaning Systems (EGCS)

We have obtained information on the use of exhaust gas cleaning systems (EGCS) in Australian waters. For full details, please refer to the attached Notice from Australian Government.

EGCS may be used as an alternative method to comply with the sulphur limit of 0.50 mass per cent concentration (m/m) in fuel oil under MARPOL Annex VI and Australia's domestic law.

Operation requires approval by the vessel's flag State or a Recognised Organisation, compliance with IMO requirements (MEPC.340(77)), adherence to discharge water standards, proper disposal of sludge and residues, and maintenance of operational records.

In case of EGCS malfunctions, immediate action should be taken, and reports made to the flag State and the Competent Authority of the port State if necessary.

Yours faithfully,

The Japan Ship Owners' Mutual Protection & Indemnity Association

Attachment: Marine Notice 2025/04—Using exhaust gas cleaning systems in Australian waters (Australian Government)



Using exhaust gas cleaning systems in Australian waters

Marine notice 2025/04

Supersedes Marine Notice 2022/12

Guidance for

- vessel owners
- operators
- masters.

Purpose

This marine notice provides guidance on using an exhaust gas cleaning system (EGCS) to support compliance with the sulphur limit of 0.50 mass per cent concentration (m/m) in fuel oil.

The sulphur limit is required by the International Convention for the Prevention of Pollution from Ships (MARPOL) Annex VI and Australia's domestic law.

General guidance only

This notice should be read in conjunction with MARPOL Annex VI and associated guidelines, relevant Acts, and Marine Orders. It does not constitute legal advice and is not a substitute for independent professional advice.

Use and operational standards

You may use an EGCS as an alternative way to comply with the low sulphur fuel requirements under MARPOL Annex VI.

In Australia, this is allowed under section 26FEGA of the *Protection of the Sea (Prevention of Pollution from Ships) Act 1983*.

To comply, your EGCS must currently be:

- approved by the vessel's flag State Administration, or a Recognised Organisation appointed by the flag State
- operated in accordance with International Maritime Organization (IMO) requirements, including the [2021 Guidelines for Exhaust Gas Cleaning Systems \(resolution MEPC.340\(77\)\)](#). (IMO Guidelines).



Discharge water standards

All EGCS types (open-loop, closed-loop, hybrid) operated in Australian waters are subject to the same discharge water standards.

You may release discharge water from EGCS in Australian waters. All discharges must meet the discharge water quality criteria in the IMO Guidelines, and as amended from time to time.

This includes discharges in waters within:

- Australia's Particularly Sensitive Sea Area (PSSA)
- areas within the MARPOL 'nearest land' boundary, including the Great Barrier Reef Marine Park.

Some port authorities may encourage vessels not to release discharge water within port limits. You should contact the specific port Authority prior to discharge.

Sludge and residue disposal

EGCS sludge and residues must be disposed of at port reception facilities. They:

- **must not be** discharged at sea
- **must not be** incinerated onboard.

Operational requirements

When operating an EGCS, you must ensure:

- crew members are familiar with correct operation of EGCS
- the system is kept in good working order and maintenance is up to date
- monitoring devices are fully functional
- records are available for inspection, including:
 - EGCS approval documents
 - operational and maintenance records for the EGCS.

Records must be kept onboard the vessel and provided on request of a Port State Control Officer (PSCO).

EGCS malfunctions

If your EGCS malfunctions², you must take immediate action and may need to report it.

Step 1: try to fix the malfunction

Identify and fix the issue as soon as possible.

If it's a one-off malfunction and you can fix it within one hour, you don't need to report it.

Step 2: switch to compliant fuel oil and report the malfunction

If the EGCS malfunction lasts more than one hour or happens repeatedly, you must:

- change over to compliant fuel oil



- report the malfunction to:
 - the vessel's flag State Administration
 - the Competent Authority of the port State of the vessel's destination.

Your report should explain the steps you are taking to address the issue.

Step 3: if you don't have enough compliant fuel oil

If the vessel doesn't have sufficient compliant fuel oil to reach the port of destination, you must:

- include this in your report
- outline the vessel's proposed course of action for agreement by the flag State Administration and Competent Authority for their agreement, which might include:
 - bunkering compliant fuel oil at the next port, or
 - carrying out repairs
- where this occurs on an Australian vessel or a foreign vessel within Australian waters, you must email the report to reports@amsa.gov.au.

Non-compliance consequences

Any EGCS that does not comply with IMO Guidelines in any respect (including but not limited to the discharge water quality criteria) may be prohibited from use in Australian waters.

Further information

- [MARPOL Annex VI](#)
- [Protection of the Sea \(Prevention of Pollution from Ships\) Act 1983](#)
- [Marine Order 97 \(Marine pollution prevention – air pollution\)](#).

Footnotes

¹ Refer to resolution MEPC.340(77) for further information.

² Refer to resolution MEPC.1/Circ.883/Rev.1 for further information.